

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR,

Defendants.

DEFENDANT'S MOTION FOR IMPOUNDMENT

Defendant and counterclaim plaintiff Voice Signal Technologies, Inc. (“Voice Signal”) moves pursuant to Local Rule 7.2 and section 14 of the parties’ agreed-to Protective Order for an order impounding (1) Defendant’s Supplemented Objection to Order on ScanSoft, Inc.’s Motion to Compel Production of Documents and Responses to Interrogatories (the “Objection”), and (2) the Declaration of Paul E. Bonanno (the “Declaration”), both of which are being filed concurrently by hand.

As grounds for this motion, Voice Signal states that the Objection and Declaration disclose portions of the transcript of the February 8, 2005 deposition of Michael Phillips that ScanSoft has designated as “Confidential.” Also, the Objection and Declaration disclose certain documents designated “Highly Confidential” that Voice Signal has produced in this case.

Pursuant to section 14 of the parties’ Protective Order, which was filed with the Court on June

18, 2004, but has not yet been entered, any documents filed with the Court that disclose materials designated “Confidential” or “Highly Confidential” must be filed under seal.

WHEREFORE, Voice Signal requests that the Court enter an order impounding the Objection and the Declaration. Voice Signal further request that the Court grant it leave, pursuant to Local Rule 7.2(d), to file the Objection and Declaration under seal concurrently with this motion for impoundment.

Respectfully submitted,

Dated: March 1, 2005

VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

/s/ Paul E. Bonanno

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CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that counsel for Voice Signal conferred with counsel for ScanSoft on March 1, 2005 in an effort to resolve the issues presented in this motion and that counsel for ScanSoft assented to this motion.

/s/ Paul E. Bonanno